



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 7, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, January 19, and February 2, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted hard drive containing electronically stored information (“ESI”) obtained by the government, which has been designated “Sensitive Discovery Material” under the February 22 Order. The drive contains:

- Primarily foreign-language ESI obtained from a search of email accounts, which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 37555 – ESI 38695).
- ESI obtained from an electronic device seized at John F. Kennedy International Airport on or about February 9, 2016, which has been

designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38696).

- Additional, primarily foreign-language documents obtained from the device whose contents were previously produced as ESI 36842 – ESI 37510, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38697).
- Additional, primarily foreign-language documents obtained from the device whose contents were previously produced as ESI 35569 – ESI 36239, which have been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 38698).
- Additional copies, including native versions, of most of the documents previously provided as ESI 30914 – ESI 30948.

Pursuant to your request, where possible these materials are being provided in native format.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Nicholas J. Moscow
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (ESI00037555-ESI00038698)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)